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**Subject:** Revised Mandatory Guidelines FR Docket 04-7984

I am writing to support the use of alternative testing methods for drug testing on the workplace other than urine samples. Hair / Sweat / Blood.

There is no question testing is valid and important. However if one is not able to provide a urine sample due to paruresis it should not be considered a refusal to be tested. Paruresis is a true disability and not an avoidance technique. We live in a society where there are many ways to accurately test for drugs without the use of urine.

If blood tests were the only way to test for drugs would we not allow an alternative for hemophiliacs ?

This is a dire issue affecting millions of Americans. Please initiate new guidelines immediately.

Thank you

Larry Chason